TUVQIÞÆÖÜŒÞVÖÖ Kein H. Shomp

## IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE

SYNTHES USA SALES, LLC,

Plaintiff, : Civil No. 3:10-cv-1102

v. : JUDGE SHARP

GREGORY W. TAYLOR and :

MORGANGRAY MEDICAL LLC, : JURY TRIAL

Defendants.

PLAINTIFF SYNTHES USA SALES, LLC'S MOTION TO EXTEND PAGE LIMIT FOR FORTHCOMING MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT

Pursuant to Local Rule 7.01(a), and the Practice and Procedure Manual for Judges and Magistrate Judges for the Middle District of Tennessee, § III.C.3, Plaintiff Synthes USA Sales, LLC ("Synthes") respectfully requests that the Court grant Synthes leave to exceed the twenty-page limit on its forthcoming Memorandum of Law in Support of its Motion for Summary Judgment, and in support thereof avers as follows:

- 1. Synthes commenced this action against Defendant Gregory Taylor ("Mr. Taylor") on November 18, 2010. *See* Compl. (D.E. No. 1.)
- 2. Since that time, the parties engaged in nearly two years of discovery, including the exchange of more than 25,000 documents, multiple sets of written discovery, and the taking of more than fifteen depositions.
- 3. During the course of this discovery, Synthes learned of the existence of additional claims against both Mr. Taylor and his company, MorganGray Medical, LLC ("MorganGray"). Accordingly, on June 16, 2011, Synthes filed its Second Amended Complaint (D.E. No. 49), which sets forth nine claims for relief